

Message

From: [redacted] [redacted]
Sent: 12/16/2019 9:28:11 PM
To: Wagner, Christine [Wagner.Christine@epa.gov]
Subject: FW: [EXT]RE: CWM Emelle Bid Response for Pile #1 BEFORE DISCOVERY OF UHC'S CWM sampling requirements

Chris,

Please re read [redacted] from [redacted] message below on disposal analysis.

We were discussing profiling 9W & Mound 5W waste as TSCA using generator knowledge. His message below request Full TCLP. This email discussion pertained to pile 1 material. He does mention that the source of the contamination can't be documented.

With that statement it may be wise to do the full TCLP on the TSCA waste to rule out RCRA? He says we can use the existing PCB data that we have.

Your thoughts?

[redacted]
Nonresponsive based on revised scope

From: [redacted]@wm.com>
Sent: Tuesday, December 10, 2019 10:46 AM
To: [redacted]
Cc: Wagner, Christine <Wagner.Christine@epa.gov>
Subject: [EXT]RE: CWM Emelle Bid Response for Pile #1 BEFORE DISCOVERY OF UHC'S

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[redacted] Christine

If Environmental Restorations treat's the metals (lead) < LDR's, the result would be a TSCA only regulated waste (PCB's > 50 ppm) [redacted] has a TSCA Permit, therefore that would be acceptable for disposal. If that TSCA waste also contained dioxin's, that are not "listed" RCRA waste, it would still be acceptable, again as long as the material did not have a RCRA waste code. UHC's are only regulated, if associated with a RCRA waste, they don't apply for a TSCA waste.

Because the specific source of this contamination can't be documented, listed waste codes would not be correct. However because of this please run a Full TCLP for disposal analysis, to rule out the RCRA concerns. **Ex. 4 CBI**

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Please run one (10-point) composite sample per every 275 tons, for Full TCLP, that you want to ship off to [redacted] for disposal analysis.

To answer your question below about why [redacted] can treat D008 (TSCA/RCRA) Lead soil < 500 ppm PCB's, but we can't if the PCB's are > 500 ppm, is a "facility permit issue", it's not a RCRA or TSCA issue. The Stabilization Plant at [redacted] has an Air Permit that requires regulated VOC's to be < 500 ppm. So it's our Air permit that's the problem with a TSCA/RCRA Metals Soil and PCB's > 500 ppm, because PCB's are SVOC's and they would go into the total calculation of VOC's. The air permit does not apply if we are just going to TSCA Landfill.

Please let me know if you have any questions.

Regards

Nonresponsive based on revised scope

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From: [redacted]
Sent: Friday, December 6, 2019 5:55 AM
To: Wagner, Christine <Wagner.Christine@epa.gov>
Subject: [redacted] Bid Response for Pile #1 BEFORE DISCOVERY OF UHC'S

Chris,
Good morning. Please see attached document from [redacted] for disposal of Pile 1 waste before discovery of the UHC's. I highlighted their conditions on their offer for accepting this waste.

As we were discussing they are limited to 500 ppm HOC's for RCRA/TSCA. That is why they offered value engineering in one of their comments. I attached our disposal analysis that went out with RFQ to reference. Our PCB was 590 ppm which exceeds the 500 ppm HOC limit [redacted] has and that is why they offered value engineering and also a cost for disposal by incineration.

The CWM contact who submitted the offer and who I have been discussing our situation with is [redacted]. Feel free to give [redacted] a call also.

Have a good day and I'll talk to you later.

Nonresponsive based on revised scope

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